

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,
Individually and as Parent and Legal
Guardian of W.W., K.W., G.W., and
L.W., minor children, and
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

PLAINTIFFS' MOTION FOR ADMISSION TO APPEAR PRO HAC VICE

Pursuant to Local Rule 84.2(b), Plaintiffs Stephanie Wadsworth, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children and Matthew Wadsworth, by and through their undersigned counsel, respectfully submit the following Motion to grant attorney Keith R. Mitnik permission to appear *pro hac vice*.

1. I, Taly Goody, an attorney with Good Law Group, P.A., 58 Malaga Cove Plaza, Palos Verdes Estates, CA 90274, Email: taly@goodylawgroup.com, telephone number (310) 893-1983, am counsel for the Plaintiffs in the above-captioned matter.
2. I, Taly Goody, certify I am a member in good standing with the Wyoming Bar Association and the U.S.D.C. District Court of Wyoming Bar. My Wyoming Bar

Number is 8-6737. I was admitted to practice in the District Court of Wyoming on June 30, 2023.

3. Movant, Keith R. Mitnik, is an attorney with Morgan & Morgan, P.A., 20 N. Orange Avenue, Suite 1600, Orlando, FL 32801, Email: kmitnik@forthepeople.com, telephone number (407) 420-1414.
4. To the best of my knowledge and belief, Mr. Mitnik is of good moral character. He is an attorney duly licensed and in good standing with the Florida State Bar, admitted on October 19, 1984, Tennessee State Bar, admitted on September 6, 2002, and the Kentucky State Bar, admitted April 25, 2014. He has never been denied *pro hac vice* admission or had admission revoked in any court. Mr. Mitnik has never been disciplined or sanctioned by any court.
5. As local counsel, I affirm that I shall be fully prepared to represent the client at any time, and in any capacity.

ACCORDINGLY, Plaintiff respectfully moves the Court to enter an Order permitting Keith R. Mitnik to appear in this matter *pro hac vice*.

Date: January 29, 2025

Respectfully Submitted,

/s/ Taly Goody, Esq.

TALY GOODY, Esq.

Wyoming Bar No.: 8-6737

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**Pro Hac Vice Pending*

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 29, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Taly Goody

Taly Goody